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March 23, 2017

**BY ECF**

Honorable Debra Freeman  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Segura, et al. v. Inkay Corp., et al.*, 16-cv-4099 (LTS)(DCF)

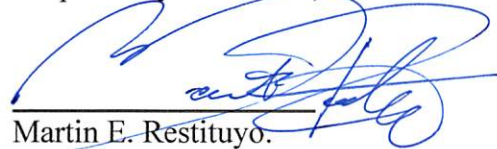
Your Honor,

This firm represents the Defendants Inkay Corp. (d/b/a Flor de Broadway) and Stephany Lopez in above-referenced matter. Pursuant to your Honor's order of February 3, 2017, the Court provided the parties until March 13, 2017, to complete discovery and until March 27, 2017, to file dispositive motions. In furtherance of that goal, the parties were all deposed on March 2 and 3 of 2017. However, as of this date, the parties have not had the opportunity to review and verify the transcripts of those depositions.

As a result, the parties have conferred and jointly request a three week extension of the deadline for filing dispositive motions to April 19, 2017.

The parties thank the Court for its time and attention to this matter.

Respectfully Submitted,



Martin E. Restituyo.

*Attorneys for Defendants*

Cc: Honorable Laura Taylor Swain.  
Shawn Clark, Esq.